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From: Glory Dolphin

Sent: Saturday, February 14, 2004 1:57 AM

To: Abeysuriya, Milanga

Cc: fanara.andrew@epa.gov

Subject: RE: Draft 2 ENERGY STAR Room Air Cleaner Specification

Dear Energy Star Program Developers,

We feel that the AHAM air cleaner standard is far too flawed and outdated to be used as a basis for the Energy Star Program. In our opinion, the Energy Star Program has been informative and valuable to consumer. It would really be a shame to decrease the value for consumers purchasing air cleaners, making Energy Star just as flawed as AHAM.

In September of 2003, we filed an FTC complaint against Consumer Reports regarding their use of the AHAM standard and their lack of thoroughly explaining their testing criteria. We feel that consumers have a right to know more details to make informed choices. We have similar concerns regarding the Energy Star Program. If Energy Star were to proceed with the proposed criteria, the use of disclaimers and more thorough explanations would be instrumental in allowing consumers to make informed choices.

For example, allergens are not just larger sized particles. Many are smaller than 0.3 microns. In fact, more than 50% of all suspended particulate matter is smaller than 0.1 microns. There is absolutely no conclusive scientific evidence that air cleaners should be evaluated on larger sized particles tested, similar to the size particles tested in the AHAM dust rating test. Evaluating air cleaners on the basis of large particles and not informing consumers would be similar to making a scientific or medical evaluation and misleading. Test dust used by AHAM is not representative of the dust found in homes. Moreover, 90% of all particles found in indoor air are smaller than the test dust used in test. This is easily verified by any particle size distribution analyzer. The AHAM dust rating is simply misleading to consumers. For the consumer's sake, please list the particle sizes and percentages of the particles evaluated in the test. The consumer has a right to know what size particles and it's representative mix were involved in the test, in order to make an informed choice.

There should also be a disclaimer that the basis of being Energy Star compliant is measured on short-term performance. I.e. the product was only tested for 3-72 hours. Consumer should also be notified that power consumption may increase with filter loading. Air cleaner performance can also substantially vary after 3-14 days based on implemented technology.

Furthermore, we, at IQAir, agree with the American Lung Association and the EPA's opinion that:

"Current evidence of the health effects of ozone suggests that there is no "safe" threshold concentration for the onset of health responses due to exposure above background ozone concentrations" - (Burnett, et al., 1994; U.S. EPA CASAC letter, 1995)

The proposed 50 ppb suggested by the Energy Star Program is far too high for the already ill consumers searching for air cleaners. Many of these consumers are allergy and asthma sufferers, with already diminished lung capacities, looking for relief from poor air quality. A more reasonable proposed level is 25 ppb or lower. American Lung Association and EPA research studies have shown that many test subjects have shown adverse reactions to ozone at much lower levels than 50 ppb. Please see the following link from the American Lung Association for more information regarding ozone:

http://www.lungusa.org/pub/cleaners/air_clean_chap4.html#h

Finally, the Energy Star Program also has a responsibility to inform consumers regarding the potential dangers in ionization. Ionization releases ions (charges particles) into room air and may attach to the surfaces of the AHAM test chamber before they are counted. In addition to the flawed performance advantages of ionizers, the EPA (www.epa.gov/iaq/pubs/residair.htm) itself recognizes the possible health effects of releasing charged particles into indoor air. Under the section "Possible Effects of Particle Charging", the EPA Summary on Residential air cleaners states:

"Another factor with respect to ion generators, particularly those that do not trap some of the charged particles, is the effect of particle charging on deposition in the respiratory tract. Experiments have shown a linear increase in particle deposition with charge; therefore, the use of ion generators may not reduce the dose of particles to the lung."

IQAir's position on this issue is to wait until there is more conclusive scientific evidence on particle sizes, short-term vs. long-term performance, ozone concentrations and health effects, ionization and lung deposition. These issues are significant to the air cleaner industry, where you have many sick consumers trying to get better. Thank you for your commitment to our environment and consumers alike. Similar to Energy Star, we, at IQAir, are also committed to informing consumers and welcome the opportunity to discuss our points further. Thank you for the opportunity to contribute.

Sincerely,

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